

**NAGEL RICE, LLP**

COUNSELLORS AT LAW

BRUCE H. NAGEL\*  
JAY J. RICE\*  
ROBERT H. SOLOMON  
BARRY M. PACKIN  
DIANE E. SAMMONS<sup>o</sup>  
LORI I. MAYER<sup>o</sup>  
RANDEE M. MATLOFF  
ANDREW L. O'CONNOR  
  
HARRY A. MARGOLIS  
(1928-2002)

119 MAPLE AVENUE  
RED BANK, NJ 07701  
(732) 933-0900

103 EISENHOWER PARKWAY  
SUITE 103  
ROSELAND, NEW JERSEY 07068  
(973) 618-0400  
FAX: (973) 618-9194  
www.nagelrice.com

PLEASE REPLY TO  
ROSELAND OFFICE

230 PARK AVENUE  
NEW YORK, NY 10169  
(212) 551-1465

OF COUNSEL  
CARLETON R. KEMPH<sup>o</sup>  
-----  
GREG M. KOHN<sup>o</sup>  
JACOB W. RADDOCK<sup>o</sup>  
ANDREW I. PEPPER

\*CERTIFIED BY THE SUPREME COURT OF  
NEW JERSEY AS A CIVIL TRIAL ATTORNEY  
<sup>o</sup> MEMBER OF N.J. & N.Y. BARS  
<sup>o</sup> ADMITTED IN N.Y. ONLY

January 27, 2012

*Via ECF and Express Mail*

The Honorable Dickinson R. Debevoise, U.S.D.J.  
Martin Luther King, Jr. Federal Building &  
United States Courthouse – Room 5083  
50 Walnut Street  
Newark, NJ 07102

**Re: *Beverly Clark, et al. v. Prudential Insurance Co. of America,*  
Civil Action No. 08-6197 (DRD) (MAS)**

Dear Judge Debevoise:

The undersigned represent Plaintiffs and Defendant in the above-captioned action. We write to respectfully request a special setting of the hearing on Plaintiffs' forthcoming motion for class certification for Friday, June 1, 2012. As indicated in the enclosed submission to Judge Shipp, the parties have recently submitted a joint request for a briefing schedule that contemplates a June 1 hearing date. Good cause exists for a special setting of the class certification hearing on June 1, 2012 because of the extensiveness of the briefing and the availability of counsel.

Respectfully submitted,

/s/ Bruce H. Nagel

Bruce H. Nagel  
for Plaintiffs Beverly  
Clark, Jesse J. Paul,  
Warren Gold, Linda M.  
Cusanelli, Carole L. Walcher  
and Terri L. Drogell

/s/ Mark S. Raffman

Mark S. Raffman  
for Defendant The Prudential  
Insurance Company of America

Enclosure

cc: All Counsel (via ECF and e-mail) (w/ encl.)

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<sup>o</sup> MEMBER OF N.J. & N.Y. BARS  
<sup>o</sup> ADMITTED IN N.Y. ONLY

HARRY A. MARGOLIS  
 (928-2002)

January 26, 2012

*Via ECF and Express Mail*

The Honorable Michael A. Shipp, U.S.M.J.  
 Martin Luther King, Jr. Federal Building &  
 United States Courthouse  
 50 Walnut Street  
 Newark, NJ 07101

**Re: *Beverly Clark, et al. v. Prudential Insurance Co. of America,***  
**Civil Action No. 08-6197 (DRD) (MAS)**

Dear Judge Shipp:

Pursuant to the Court's Order dated January 9, 2012 (Doc. No. 182), the parties submit this joint status letter. The parties have completed fact and expert discovery related to class certification issues and there are no discovery-related disputes that require the Court's attention at this time. The parties participated in mediation before Professor Eric Green in New York on November 21, but the case did not settle.

With regard to Plaintiffs' motion for class certification, the parties jointly propose the following schedule:

Filing	Due Date	Page Limit
Plaintiffs' Memorandum in Support of Class Certification	February 22, 2012	75 pages
Defendant's Memorandum in Opposition to Class Certification	April 2, 2012	80 pages
Plaintiffs' Reply Memorandum	April 30, 2012	40 pages
Oral Argument	June 1, 2012, at the Court's discretion <sup>1</sup>	

<sup>1</sup> The parties intend to jointly request that Judge Debevoise specially set oral argument on the Plaintiffs' motion for class certification on June 1, 2012, or a date that is convenient to the Court.

Exh. A

Hon. Michael A. Shipp  
*Clark, et al. v. Prudential Ins. Co. of Am.*  
Civil Action No. 08-6197 (DRD) (MAS)  
January 26, 2012  
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Respectfully submitted,

/s/ Bruce H. Nagel

Bruce H. Nagel  
for Plaintiffs Beverly  
Clark, Jesse J. Paul,  
Warren Gold, Linda M.  
Cusanelli, Carole L. Walcher  
and Terri L. Drogell

/s/ Mark S. Raffman

Mark S. Raffman  
for Defendant The Prudential  
Insurance Company of America

cc: All Counsel (via ECF and e-mail)